# Statement of Basis of the Federal Operating Permit

Atlantic Coffee Industrial Solutions, LLC

Site Name: Houston Plant Physical Location: 3900 Harrisburg Blvd Nearest City: Houston County: Harris

> Permit Number: O1018 Project Type: Renewal

Standard Industrial Classification (SIC) Code: 2095 SIC Name: Roasted Coffee

This Statement of Basis sets forth the legal and factual basis for the draft permit conditions in accordance with 30 TAC §122.201(a)(4). Per 30 TAC §§ 122.241 and 243, the permit holder has submitted an application under § 122.134 for permit renewal. This document may include the following information:

A description of the facility/area process description;

A basis for applying permit shields;

A list of the federal regulatory applicability determinations;

A table listing the determination of applicable requirements;

A list of the New Source Review Requirements;

The rationale for periodic monitoring methods selected;

The rationale for compliance assurance methods selected:

A compliance status; and

A list of available unit attribute forms.

Prepared on: September 27, 2016

## Operating Permit Basis of Determination

#### **Permit Area Process Description**

Atlantic operates a coffee and rice processing facility. The facility overview and process descriptions are outlined below.

#### **Boilers**

Boiler No. 6 has refractory-lined cells at the first level where coffee grounds and chaff are incinerated. Boiler No. 6 has a natural gas burner that is used to aid in the incineration of the ground and chaff. Boiler No 7 (THEOBOIL) is primarily used as a small back-up for Boiler No. 6 and is heated with natural gas. Boiler 5 is currently out of commission.

## **Roasting Systems and Blending**

Green coffee is supplied by either the storage silos in Building 22 or from the bulk dump station. Caffeinated beans are received by airveyors and then are conveyed into Caff Silo #1.

The green coffee is then supplied to each roaster by an airveyor that exhausts through a receiver cyclone. The beans then are transferred from the cyclone into a scale bin that feeds one of eight Probat Roasters. After roasting occurs, the beans are emptied from the roaster into a cooling car. After cooling, they pass through a destoner that exhausts through a cyclone. The beans proceed to the hold-up bins to await transfer to the blending system.

While in the blending system, the roasted coffee beans are airveyed from the roaster surge bins to receiving cyclones and then into silos. From these silos, the coffee beans are transferred to bins that feed the coffee grinders for the various packaging processes.

#### Extraction/AMCO 1 & AMCO 2

For caffeine extraction, green coffee beans are airveyed to the North Side System (AMCO 1) and to the South Side System (AMCO 2) to a receiver cyclone; they then go into two green bean destoners that discharge into four green bean polishers. The beans are then discharged into a screw conveyor that goes to a screener that removes the small beans. The small beans proceed into the small bean system and the green coffee proceeds by bucket elevator and screw conveyor to a holding bin.

From the holding bins, the beans are dropped into a scale bin that discharges into holding bins and then into a conditioner. The beans are then processed through two conditioners and four moisturizers to prepare them for the decaffeinating process. The last moisturizer discharges into a vibrator feeder screen that then discharges into two separators. Excess water and chaff from the beans are removed. The separators discharge into a screw conveyor that discharges through a magnet into a surge bin.

The conditioned green coffee beans from the extraction South and North systems are airveyed to bean feed hoppers and are transferred into the Extractor Unit. Carbon dioxide ( $CO_2$ ) is circulated through the beans to extract the caffeine. The  $CO_2$  is circulated through the Water Absorber to remove the caffeine from the  $CO_2$ . The  $CO_2$  is then circulated back through the process.

After the beans are extracted, they are transferred from the Product Hopper to the Link Belt Receiver and into the Link Belt dryer. From the dryer, the beans may be sent to the processing units or to a finishing dryer.

After decaffeination, the beans are sent to a blending system that blends the beans into different types of coffee. After the beans are processed through a ribbon blender, the coffee is then stored in bins for further processing or storage.

## Soluble

Green coffee beans are airveyed from the green coffee silos to the continuous roasters. After the roasting processes, the beans are transferred to one of three airveyors and sent to the grinder. After the coffee is ground, it is weighed and goes into one of six ground coffee batch bins over the percolators. The ground coffee is put into the percolator and the soluble solids are leeched from the ground coffee with water. The liquid extract is drawn from the percolator and pumped to a scale tank.

The spend coffee grounds are blown with steam pressure from the percolator into a holding tank and then transferred into a pulp press to remove the excess water. The grounds are then sent to the online boiler where they are incinerated. Vapors are then drawn from the scale tank into an absorber and condensed to a liquid. The liquid goes into a feed tank and is fed into the liquid extract stream, which feeds the spray dryers. The extract is introduced into the spray dryer through atomizing nozzles and dried into a powdered coffee. The coffee then passes through a cooler conveyor and into a tote bin for storage or is airveyed to the Agglomerator.

The powdered coffee that goes to the Agglomerator must first go through a Fitz mill where CO<sub>2</sub> cools the coffee. The coffee then passes through a number of conveyors before it passes through a Rotex screener for sizing of the product. The large particles go back to the feed bin at the start of the process. The good product goes through a final drier, cooler, and then to a tote bin. The tote bins are then placed in a warehouse where they are moved to the packaging area and emptied into a surge bin. The coffee then goes through a filler and into containers, where they are then sealed, labeled, and placed into cardboard cartons.

#### Rice

Milled rice is brought into the plant by railcars or trucks and moved from the unloading point by conveyor belts, bucket elevators, and screw conveyors to the east or west storage bins. From these storage bins, the rice is moved by an aspirator into a bucket that discharges into a grader and finally into a surge bin. The rice goes from the surge bin to four slurry tanks that then discharge into four steamers that feed Dryers A & B. The dried rice is released from the dryer onto a vibrating screen to remove fine and small particles. The rice is then transferred into bins before it is packaged into boxes for shipment.

#### **Emergency Engine/Fire Water Pump**

Additionally, Atlantic has one emergency engine and one fire water pump that are used for emergencies.

#### **FOPs at Site**

The "application area" consists of the emission units and that portion of the site included in the application and this permit. Multiple FOPs may be issued to a site in accordance with 30 TAC § 122.201(e). When there is only one area for the site, then the application information and permit will include all units at the site. Additional FOPs that exist at the site, if any, are listed below.

Additional FOPs: None

#### **Major Source Pollutants**

The table below specifies the pollutants for which the site is a major source:

Major Pollutants	PM, NOX, CO
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#### **Reading State of Texas's Federal Operating Permit**

The Title V Federal Operating Permit (FOP) lists all state and federal air emission regulations and New Source Review (NSR) authorizations (collectively known as "applicable requirements") that apply at a particular site or permit area (in the event a site has multiple FOPs). **The FOP does not authorize new emissions or new construction activities.** The FOP begins with an introductory page which is common to all Title V permits. This page gives the details of the company, states the authority of the issuing agency, requires the company to operate in accordance with this permit and 30 Texas Administrative Code (TAC) Chapter 122, requires adherence with NSR requirements of 30 TAC Chapter 116, and finally indicates the permit number and the issuance date.

This is followed by the table of contents, which is generally composed of the following elements. Not all permits will have all of the elements.

- General Terms and Conditions
- Special Terms and Conditions
  - Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting
  - Additional Monitoring Requirements
  - o New Source Review Authorization Requirements
  - o Compliance Requirements
  - o Protection of Stratosphere Ozone
  - o Permit Location
  - o Permit Shield (30 TAC § 122.148)
- Attachments
  - Applicable Requirements Summary
    - Unit Summary
    - Applicable Requirements Summary
  - Additional Monitoring Requirements
  - Permit Shield
  - New Source Review Authorization References
  - o Compliance Plan
  - Alternative Requirements
- Appendix A
  - o Acronym list

#### General Terms and Conditions

The General Terms and Conditions are the same and appear in all permits. The first paragraph lists the specific citations for 30 TAC Chapter 122 requirements that apply to all Title V permit holders. The second paragraph describes the requirements for record retention. The third paragraph provides details for voiding the permit, if applicable. The fourth paragraph states that the permit holder shall comply with the requirements of 30 TAC Chapter 116 by obtaining a New Source Review authorization prior to new construction or modification of emission units located in the area covered by this permit. The fifth paragraph provides details on submission of reports required by the permit.

#### Special Terms and Conditions

Emissions Limitations and Standards, Monitoring and Testing, and Recordkeeping and Reporting. The TCEQ has designated certain applicable requirements as site-wide requirements. A site-wide requirement is a requirement that applies uniformly to all the units or activities at the site. Units with only site-wide requirements are addressed on Form OP-REQ1 and are not required to be listed separately on a OP-UA Form or Form OP-SUM. Form OP-SUM must list all units addressed in the application and provide identifying information, applicable OP-UA Forms, and preconstruction authorizations. The various OP-UA Forms provide the characteristics of each unit from which applicable requirements are established. Some exceptions exist as a few units may have both site-wide requirements and unit specific requirements.

Other conditions. The other entries under special terms and conditions are in general terms referring to compliance with the more detailed data listed in the attachments.

#### Attachments

Applicable Requirements Summary. The first attachment, the Applicable Requirements Summary, has two tables, addressing unit specific requirements. The first table, the Unit Summary, includes a list of units with applicable requirements, the unit type, the applicable regulation, and the requirement driver. The intent of the

requirement driver is to inform the reader that a given unit may have several different operating scenarios and the differences between those operating scenarios.

The applicable requirements summary table provides the detailed citations of the rules that apply to the various units. For each unit and operating scenario, there is an added modifier called the "index number," detailed citations specifying monitoring and testing requirements, recordkeeping requirements, and reporting requirements. The data for this table are based on data supplied by the applicant on the OP-SUM and various OP-UA forms.

Additional Monitoring Requirement. The next attachment includes additional monitoring the applicant must perform to ensure compliance with the applicable standard. Compliance assurance monitoring (CAM) is often required to provide a reasonable assurance of compliance with applicable emission limitations/standards for large emission units that use control devices to achieve compliance with applicant requirements. When necessary, periodic monitoring (PM) requirements are specified for certain parameters (i.e. feed rates, flow rates, temperature, fuel type and consumption, etc.) to determine if a term and condition or emission unit is operating within specified limits to control emissions. These additional monitoring approaches may be required for two reasons. First, the applicable rules do not adequately specify monitoring requirements (exception- Maximum Achievable Control Technology Standards (MACTs) generally have sufficient monitoring), and second, monitoring may be required to fill gaps in the monitoring requirements of certain applicable requirements. In situations where the NSR permit is the applicable requirement requiring extra monitoring for a specific emission unit, the preferred solution is to have the monitoring requirements in the NSR permit updated so that all NSR requirements are consolidated in the NSR permit.

Permit Shield. A permit may or may not have a permit shield, depending on whether an applicant has applied for, and justified the granting of, a permit shield. A permit shield is a special condition included in the permit document stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirement(s) or specified applicable state-only requirement(s).

New Source Review Authorization References. All activities which are related to emissions in the state of Texas must have a NSR authorization prior to beginning construction. This section lists all units in the permit and the NSR authorization that allowed the unit to be constructed or modified. Units that do not have unit specific applicable requirements other than the NSR authorization do not need to be listed in this attachment. While NSR permits are not physically a part of the Title V permit, they are legally incorporated into the Title V permit by reference. Those NSR permits whose emissions exceed certain PSD/NA thresholds must also undergo a Federal review of federally regulated pollutants in addition to review for state regulated pollutants.

Compliance Plan. A permit may have a compliance schedule attachment for listing corrective actions plans for any emission unit that is out of compliance with an applicable requirement.

Alternative Requirements. This attachment will list any alternative monitoring plans or alternative means of compliance for applicable requirements that have been approved by the EPA Administrator and/or the TCEQ Executive Director.

#### Appendix A

Acronym list. This attachment lists the common acronyms used when discussing the FOPs.

# Stationary vents subject to 30 TAC Chapter 111, Subchapter A, § 111.111(a)(1)(B) addressed in the Special Terms and Conditions

The site contains stationary vents with a flowrate less than 100,000 actual cubic feet per minute (acfm) and constructed after January 31, 1972 which are limited, over a six-minute average, to 20% opacity as required by 30 TAC § 111.111(a)(1)(B). As a site may have a large number of stationary vents that fall into this category, they are not required to be listed individually in the permit's Applicable Requirement Summary. This is consistent with EPA's White Paper for Streamlined Development of Part 70 Permit Applications, July 10, 1995,

that states that requirements that apply identically to emission units at a site can be treated on a generic basis such as source-wide opacity limits.

Periodic monitoring is specified in Special Term and Condition 3.A for stationary vents subject to 30 TAC § 111.111(a)(1)(B) to verify compliance with the 20% opacity limit. These vents are not expected to produce visible emissions during normal operation. The TCEQ evaluated the probability of these sources violating the opacity standards and determined that there is a very low potential that an opacity standard would be exceeded. It was determined that continuous monitoring for these sources is not warranted as there would be very limited environmental benefit in continuously monitoring sources that have a low potential to produce visible emissions. Therefore, the TCEQ set the visible observation monitoring frequency for these sources to once per calendar quarter.

The TCEQ has exempted vents that are not capable of producing visible emissions from periodic monitoring requirements. These vents include sources of colorless VOCs, non-fuming liquids, and other materials that cannot produce emissions that obstruct the transmission of light. Passive ventilation vents, such as plumbing vents, are also included in this category. Since this category of vents are not capable of producing opacity due to the physical or chemical characteristics of the emission source, periodic monitoring is not required as it would not yield any additional data to assure compliance with the 20% opacity standard of 30 TAC § 111.111(a)(1)(B).

In the event that visible emissions are detected, either through the quarterly observation or other credible evidence, such as observations from company personnel, the permit holder shall either report a deviation or perform a Test Method 9 observation to determine the opacity consistent with the 6-minute averaging time specified in 30 TAC § 111.111(a)(1)(B). An additional provision is included to monitor combustion sources more frequently than quarterly if alternate fuels are burned for periods greater than 24 consecutive hours. This will address possible emissions that may arise when switching fuel types.

Stationary Vents subject to 30 TAC Chapter 111 not addressed in the Special Terms and Conditions All other stationary vents subject to 30 TAC Chapter 111 not covered in the Special Terms and Conditions are listed in the permit's Applicable Requirement Summary. The basis for the applicability determinations for these vents are listed in the Determination of Applicable Requirements table.

## **Federal Regulatory Applicability Determinations**

The following chart summarizes the applicability of the principal air pollution regulatory programs to the permit area:

Regulatory Program	Applicability (Yes/No)
Prevention of Significant Deterioration (PSD)	No
Nonattainment New Source Review (NNSR)	No
Minor NSR	Yes
40 CFR Part 60 - New Source Performance Standards	Yes
40 CFR Part 61 - National Emission Standards for Hazardous Air Pollutants (NESHAPs)	No
40 CFR Part 63 - NESHAPs for Source Categories	Yes
Title IV (Acid Rain) of the Clean Air Act (CAA)	No
Title V (Federal Operating Permits) of the CAA	Yes
Title VI (Stratospheric Ozone Protection) of the CAA	No

CAIR (Clean Air Interstate Rule)	No
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## **Basis for Applying Permit Shields**

An operating permit applicant has the opportunity to specifically request a permit shield to document that specific applicable requirements do not apply to emission units in the permit. A permit shield is a special condition stating that compliance with the conditions of the permit shall be deemed compliance with the specified potentially applicable requirements or specified potentially applicable state-only requirements. A permit shield has been requested in the application for specific emission units. For the permit shield requests that have been approved, the basis of determination for regulations that the owner/operator need not comply with are located in the "Permit Shield" attachment of the permit.

## **Insignificant Activities**

In general, units not meeting the criteria for inclusion on either Form OP-SUM or Form OP-REQ1 are not required to be addressed in the operating permit application. Examples of these types of units include, but are not limited to, the following:

- 1. Office activities such as photocopying, blueprint copying, and photographic processes.
- 2. Sanitary sewage collection and treatment facilities other than those used to incinerate wastewater treatment plant sludge. Stacks or vents for sanitary sewer plumbing traps are also included.
- 3. Food preparation facilities including, but not limited to, restaurants and cafeterias used for preparing food or beverages primarily for consumption on the premises.
- 4. Outdoor barbecue pits, campfires, and fireplaces.
- 5. Laundry dryers, extractors, and tumblers processing bedding, clothing, or other fabric items generated primarily at the premises. This does not include emissions from dry cleaning systems using perchloroethylene or petroleum solvents.
- 6. Facilities storing only dry, sweet natural gas, including natural gas pressure regulator vents.
- 7. Any air separation or other industrial gas production, storage, or packaging facility. Industrial gases, for purposes of this list, include only oxygen, nitrogen, helium, neon, argon, krypton, and xenon.
- 8. Storage and handling of sealed portable containers, cylinders, or sealed drums.
- 9. Vehicle exhaust from maintenance or repair shops.
- 10. Storage and use of non-VOC products or equipment for maintaining motor vehicles operated at the site (including but not limited to, antifreeze and fuel additives).
- 11. Air contaminant detectors and recorders, combustion controllers and shut-off devices, product analyzers, laboratory analyzers, continuous emissions monitors, other analyzers and monitors, and emissions associated with sampling activities. Exception to this category includes sampling activities that are deemed fugitive emissions and under a regulatory leak detection and repair program.
- 12. Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including but not limited to, assorted vacuum producing devices and laboratory fume hoods.
- 13. Steam vents, steam leaks, and steam safety relief valves, provided the steam (or boiler feedwater) has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 14. Storage of water that has not contacted other materials or fluids containing regulated air pollutants other than boiler water treatment chemicals.
- 15. Well cellars.
- 16. Fire or emergency response equipment and training, including but not limited to, use of fire control equipment including equipment testing and training, and open burning of materials or fuels associated with firefighting training.
- 17. Crucible or pot furnaces with a brim full capacity of less than 450 cubic inches of any molten metal.
- 18. Equipment used exclusively for the melting or application of wax.
- 19. All closed tumblers used for the cleaning or deburring of metal products without abrasive blasting, and all open tumblers with a batch capacity of 1,000 lbs. or less.

- 20. Shell core and shell mold manufacturing machines.
- 21. Sand or investment molds with a capacity of 100 lbs. or less used for the casting of metals;
- 22. Equipment used for inspection of metal products.
- 23. Equipment used exclusively for rolling, forging, pressing, drawing, spinning, or extruding either hot or cold metals by some mechanical means.
- 24. Instrument systems utilizing air, natural gas, nitrogen, oxygen, carbon dioxide, helium, neon, argon, krypton, and xenon.
- 25. Battery recharging areas.
- 26. Brazing, soldering, or welding equipment.

## **Determination of Applicable Requirements**

The tables below include the applicability determinations for the emission units, the index number(s) where applicable, and all relevant unit attribute information used to form the basis of the applicability determination. The unit attribute information is a description of the physical properties of an emission unit which is used to determine the requirements to which the permit holder must comply. For more information about the descriptions of the unit attributes specific Unit Attribute Forms may be viewed at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html">www.tceq.texas.gov/permitting/air/nav/air\_all\_ua\_forms.html</a>.

A list of unit attribute forms is included at the end of this document. Some examples of unit attributes include construction date; product stored in a tank; boiler fuel type; etc.. Generally, multiple attributes are needed to determine the requirements for a given emission unit and index number. The table below lists these attributes in the column entitled "Basis of Determination." Attributes that demonstrate that an applicable requirement applies will be the factual basis for the specific citations in an applicable requirement that apply to a unit for that index number. The TCEQ Air Permits Division has developed flowcharts for determining applicability of state and federal regulations based on the unit attribute information in a Decision Support System (DSS). These flowcharts can be accessed via the internet at <a href="https://www.tceq.texas.gov/permitting/air/nav/air\_supportsys.html">www.tceq.texas.gov/permitting/air/nav/air\_supportsys.html</a>. The Air Permits Division staff may also be contacted for assistance at (512) 239-1250.

The attributes for each unit and corresponding index number provide the basis for determining the specific legal citations in an applicable requirement that apply, including emission limitations or standards, monitoring, recordkeeping, and reporting. The rules were found to apply or not apply by using the unit attributes as answers to decision questions found in the flowcharts of the DSS. Some additional attributes indicate which legal citations of a rule apply. The legal citations that apply to each emission unit may be found in the Applicable Requirements Summary table of the draft permit. There may be some entries or rows of units and rules not found in the permit, or if the permit contains a permit shield, repeated in the permit shield area. These are sets of attributes that describe negative applicability, or; in other words, the reason why a potentially applicable requirement does not apply.

If applicability determinations have been made which differ from the available flowcharts, an explanation of the decisions involved in the applicability determination is specified in the column "Changes and Exceptions to RRT." If there were no exceptions to the DSS, then this column has been removed.

The draft permit includes all emission limitations or standards, monitoring, recordkeeping and reporting required by each applicable requirement. If an applicable requirement does not require monitoring, recordkeeping, or reporting, the word "None" will appear in the Applicable Requirements Summary table. If additional periodic monitoring is required for an applicable requirement, it will be explained in detail in the portion of this document entitled "Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected."

When attributes demonstrate that a unit is not subject to an applicable requirement, the applicant may request a permit shield for those items. The portion of this document entitled "Basis for Applying Permit Shields" specifies which units, if any, have a permit shield.

Operational Flexibility

When an emission unit has multiple operating scenarios, it will have a different index number associated with each operating condition. This means that units are permitted to operate under multiple operating conditions. The applicable requirements for each operating condition are determined by a unique set of unit attributes. For example, a tank may store two different products at different points in time. The tank may, therefore, need to comply with two distinct sets of requirements, depending on the product that is stored. Both sets of requirements are included in the permit, so that the permit holder may store either product in the tank.

## **Determination of Applicable Requirements**

Unit ID	Regulation	Index Number	Basis of Determination*
EMERGEN1	30 TAC Chapter 117, Subchapter B	R7201-01	Type of Service = Used exclusively in emergency situations [claiming the emergency service exemption under 30 TAC §§ 117.103(a)(6)(D), 117.203(a)(6)(D), 117.303(a)(6)(D) or 117.403(a)(7)(D)]
			Fuel Fired = Natural gas
EMERGEN1	40 CFR Part 60, Subpart JJJJ	60JJJJ-01	Construction/Reconstruction/Modification Date = The stationary spark ignition (SI) internal combustion engine (ICE) commenced construction, reconstruction or modification after June 12, 2006.
			Manufactured Date = Date of manufacture is prior to January 1, 2009.
			Test Cell = The SI ICE is not being tested at an engine test cell/stand.
			National Security = The SI ICE is not eligible for exemption due to national security.
			Temp Replacement = The SI ICE is not acting as a temporary replacement.
			Horsepower = Maximum engine power greater than or equal to 130 HP and less than 500 HP.
			Fuel = SI ICE that uses natural gas.
			Commencing = SI ICE that is commencing new construction.
EMERGEN1	40 CFR Part 63,	63ZZZZ-01	HAP Source = Any stationary source of hazardous air pollutants that is not a major source as defined in 40 CFR § 63.2.
	Subpart ZZZZ		Brake HP = Stationary RICE with a brake HP greater than or equal to 250 HP and less than 300 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction on or after June 12, 2006.
FWPUMP1	30 TAC Chapter 117, Subchapter	R7201-02	Type of Service = Used exclusively in emergency situations [claiming the emergency service exemption under 30 TAC §§ 117.103(a)(6)(D), 117.203(a)(6)(D), 117.303(a)(6)(D) or 117.403(a)(7)(D)]
	В		Fuel Fired = Petroleum-based diesel fuel
FWPUMP1	40 CFR Part 60, Subpart IIII	60ШІ-05-	Applicability Date = Stationary CI ICE commenced construction, reconstruction, or modification on or before July 11, 2005.
FWPUMP1	40 CFR Part 63,	63ZZZZ-02	HAP Source = Any stationary source of hazardous air pollutants that is not a major source as defined in 40 CFR § 63.2.
	Subpart ZZZZ		Brake HP = Stationary RICE with a brake HP greater than or equal to 100 HP and less than 250 HP.
			Construction/Reconstruction Date = Commenced construction or reconstruction before December 19, 2002.
			Nonindustrial Emergency Engine = Stationary RICE is not defined in 40 CFR §63.6675 as a residential emergency RICE, a commercial emergency RICE, or an institutional emergency RICE.
			Service Type = Emergency use where the RICE does not operate or is not contractually obligated to be available for more than 15 hours per calendar year as specified in 40 CFR §63.6640(f)(2)(ii)-(iii) or does not operate as specified in 40 CFR §63.6640(f)(4)(ii).
			Stationary RICE Type = Compression ignition engine
BOILER5	30 TAC Chapter 117, Subchapter	R7201-002	NOx Emission Limitation = Title 30 TAC § 117.310(d)(3) [relating to mass emissions cap and trade in 30 TAC Chapter 101, Subchapter H, Division 3 and Emission Specifications for Attainment Demonstration].
	В		Unit Type = Other industrial, commercial, or institutional boiler.
			Maximum Rated Capacity = MRC is greater than or equal to 40 MMBtu/hr but less than 100 MMBtu/hr.
			NOx Monitoring System = Continuous emissions monitoring system.
			Fuel Flow Monitoring = Unit operates with a $NO_x$ and diluent CEMS and monitors stack exhaust flow per 30 TAC

Unit ID	Regulation	Index Number	Basis of Determination*
			§§ 117.140(a)(2)(A), 117.340(a)(2)(A) or 117.440(a)(2)(A).
			CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option.
			CO Monitoring System = Continuous emissions monitoring system complying with 30 TAC § 117.8100(a)(1).
			EGF System Cap Unit = The unit is not used as an electric generating facility to generate electricity for sale to the electric grid.
			Fuel Type #1 = Natural gas.
			NOx Emission Limit Average = Emission limit in pounds/MMBtu on a rolling 30-day average.
			$NOx Reductions = No NO_x reduction.$
			Annual Heat Input = Annual heat input is less than or equal to $2.8(10^{11})$ Btu/yr, based on rolling 12-month average.
BOILER5	40 CFR Part 60, Subpart D	1	Construction/Modification Date = On or before August 17, 1971.
BOILER5	40 CFR Part 60, Subpart Db	1	Construction/Modification Date = On or before June 19, 1984.
BOILER5	40 CFR Part 60,	1	Construction/Modification Date = On or before June 9, 1989.
	Subpart Dc		Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than 100 MMBtu/hr (29 MW).
BOILER6	30 TAC Chapter 117, Subchapter	R7201-003	NOx Emission Limitation = Title 30 TAC § 117.310(d)(3) [relating to mass emissions cap and trade in 30 TAC Chapter 101, Subchapter H, Division 3 and Emission Specifications for Attainment Demonstration].
	В		Unit Type = Other industrial, commercial, or institutional boiler.
			Maximum Rated Capacity = MRC is greater than or equal to 100 MMBtu/hr but less than 200 MMBtu/hr.
			NOx Monitoring System = Continuous emissions monitoring system.
			Fuel Flow Monitoring = Unit operates with a NO $_x$ and diluent CEMS and monitors stack exhaust flow per 30 TAC §§ 117.140(a)(2)(A), 117.340(a)(2)(A) or 117.440(a)(2)(A).
			CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option.
			CO Monitoring System = Continuous emissions monitoring system complying with 30 TAC § 117.8100(a)(1).
			EGF System Cap Unit = The unit is not used as an electric generating facility to generate electricity for sale to the electric grid.
			Fuel Type #1 = Natural gas.
			NOx Emission Limit Average = Emission limit in pounds/MMBtu on a rolling 30-day average.
			$NOx Reductions = No NO_x reduction.$
			Annual Heat Input = Annual heat input is greater than $2.2(10^{11})$ Btu/yr, based on rolling 12-month average.
BOILER6	40 CFR Part 60, Subpart D	1	Construction/Modification Date = On or before August 17, 1971.
BOILER6	40 CFR Part 60, Subpart Db	1	Construction/Modification Date = On or before June 19, 1984.
BOILER6	40 CFR Part 60,	1	Construction/Modification Date = On or before June 9, 1989.
	Subpart Dc		Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than 100 MMBtu/hr (29 MW).
BOILER6	40 CFR Part 63, Subpart JJJJJJ	63JJJJJJ-001	Construction/Reconstruction Date = Constructed or reconstructed on or before June 4, 2010.

Unit ID	Regulation	Index Number	Basis of Determination*
THEOBOIL	30 TAC Chapter 117, Subchapter	R7201-001	NOx Emission Limitation = Title 30 TAC § 117.310(d)(3) [relating to mass emissions cap and trade in 30 TAC Chapter 101, Subchapter H, Division 3 and Emission Specifications for Attainment Demonstration].
	В		Unit Type = Other industrial, commercial, or institutional boiler.
			Maximum Rated Capacity = MRC is greater than 2 MMBtu/hr but less than 40 MMBtu/hr.
			NOx Monitoring System = Maximum emission rate testing.
			Fuel Flow Monitoring = Fuel flow is monitored with a totalizing fuel flow meter per 30 TAC §§ 117.140(a), 117.340(a) or 117.440(a).
			CO Emission Limitation = Title 30 TAC § 117.310(c)(1) 400 ppmv option.
			CO Monitoring System = Monitored by method other than CEMS or PEMS.
			EGF System Cap Unit = The unit is not used as an electric generating facility to generate electricity for sale to the electric grid.
			Fuel Type #1 = Natural gas.
			NOx Emission Limit Average = Emission limit in pounds/MMBtu on a rolling 30-day average.
			$NOx Reductions = No NO_x reduction.$
THEOBOIL	40 CFR Part 60,	1	Construction/Modification Date = After September 18, 1978.
	Subpart D		Covered Under Subpart Da = The steam generating unit is not covered under 40 CFR Part 60, Subpart Da.
			Changes to Existing Affected Facility = No change has been made to the existing fossil fuel-fired steam generating unit.
			Heat Input Rate = Heat input rate is less than or equal to 250 MMBtu/hr (73 MW).
THEOBOIL	40 CFR Part 60,	1	Construction/Modification Date = Constructed or reconstructed after July 9, 1997, and on or before February 28, 2005.
	Subpart Db		Heat Input Capacity = Heat input capacity is less than or equal to 100 MMBtu/hr (29 MW).
THEOBOIL	40 CFR Part 60,	60DC-001	Construction/Modification Date = After June 9, 1989 but on or before February 28, 2005.
	Subpart Dc		PM Monitoring Type = No particulate monitoring.
			Maximum Design Heat Input Capacity = Maximum design heat input capacity is greater than or equal to 10 MMBtu/hr (2.9 MW) but less than or equal to 100 MMBtu (29 MW).
			SO2 Inlet Monitoring Type = Fuel certification (or maintaining receipts).
			Other Subparts = The facility is not covered under 40 CFR Part 60, Subparts AAAA or KKKK, or under an approved State or Federal section 111(d)/129 plan implementing 40 CFR Part 60, Subpart BBBB.
			SO2 Outlet Monitoring Type = No SO <sub>2</sub> monitoring.
			Heat Input Capacity = Heat input capacity is greater than or equal to 30 MMBtu/hr (8.7 MW) but less than or equal to 75 MMBtu/hr (22 MW).
			Technology Type = None.
			D-Series Fuel Type = Natural gas.
			$47\text{C-Option} = \text{COMS}$ exemption § $60.47\text{c}(c)$ for a facility burning only distillate oil containing $0.5$ % or less by weight sulfur and/or liquid or gaseous fuels with potential $SO_2$ emission rates of no more than $26$ ng/J ( $0.060$ lb/MMBtu), no post-combustion technology
			ACF Option - SO2 = Other ACF or no ACF.
			ACF Option - PM = Other ACF or no ACF.
			30% Coal Duct Burner = The facility does not combust coal in a duct burner as part of a combined cycle system; or more than

Unit ID	Regulation	Index Number	Basis of Determination*
			30% of the heat is from combustion of coal and less than 70% is from exhaust gases entering the duct burner.
COOLTOW	40 CFR Part 63, Subpart Q	1	Used Compounds Containing Chromium on or After September 8, 1994 = The industrial process cooling tower has not used compounds containing chromium on or after September 8, 1994.
BOILER6	30 TAC Chapter 111, Visible Emissions	R1111-003	Alternate Opacity Limitation = Not complying with an alternate opacity limit under 30 TAC § 111.113.  Vent Source = The source of the vent is not a steam generator fired by solid fossil fuel, oil or a mixture of oil and gas and is not a catalyst regenerator for a fluid bed catalytic cracking unit.  Opacity Monitoring System = Optical instrument capable of measuring the opacity of emissions is not installed in the vent or optical instrumentation does not meet the requirements of § 111.111(a)(1)(D), or the vent stream does not qualify for the exemption in § 111.111(a)(3).  Construction Date = On or before January 31, 1972  Effluent Flow Rate = Effluent flow rate is less than 100,000 actual cubic feet per minute.
WASHER1	30 TAC Chapter 115, Degreasing Processes	R5412-01	Solvent Degreasing Machine Type = Remote reservoir cold solvent cleaning machine.  Alternate Control Requirement = The TCEQ Executive Director has not approved an alternative control requirement as allowed under 30 TAC § 115.413 or not alternative has been requested.  Solvent Sprayed = No solvent is sprayed.  Solvent Vapor Pressure = Solvent vapor pressure is less than or equal to 0.6 psia as measured at 100 degrees Fahrenheit.  Solvent Heated = The solvent is not heated to a temperature greater than 120° F.  Parts Larger than Drainage = Cleaned parts for which the machine is authorized to clean are larger than the internal drainage facility of the machine.  Drainage Area = Area is less than 16 square inches.  Disposal in Enclosed Containers = Waste solvent is properly disposed of in enclosed containers.

<sup>\* -</sup> The "unit attributes" or operating conditions that determine what requirements apply

#### **NSR Versus Title V FOP**

The state of Texas has two Air permitting programs, New Source Review (NSR) and Title V Federal Operating Permits. The two programs are substantially different both in intent and permit content.

NSR is a preconstruction permitting program authorized by the Texas Clean Air Act and Title I of the Federal Clean Air Act (FCAA). The processing of these permits is governed by 30 Texas Administrative Code (TAC) Chapter 116.111. The Title V Federal Operating Program is a federal program authorized under Title V of the FCAA that has been delegated to the state of Texas to administer and is governed by 30 TAC Chapter 122. The major differences between the two permitting programs are listed in the table below:

NSR Permit	Federal Operating Permit(FOP)
Issued Prior to new Construction or modification	For initial permit with application shield, can be issued
of an existing facility	after operation commences; significant revisions require
	approval prior to operation.
Authorizes air emissions	Codifies existing applicable requirements, does not
	authorize new emissions
Ensures issued permits are protective of the	Applicable requirements listed in permit are used by
environment and human health by conducting a	the inspectors to ensure proper operation of the site as
health effects review and that requirement for	authorized. Ensures that adequate monitoring is in
best available control technology (BACT) is	place to allow compliance determination with the FOP.
implemented.	
Up to two Public notices may be required.	One public notice required. Opportunity for public
Opportunity for public comment and contested	comments. No contested case hearings.
case hearings for some authorizations.	
Applies to all point source emissions in the state.	Applies to all major sources and some non-major
	sources identified by the EPA.
Applies to facilities: a portion of site or	One or multiple FOPs cover the entire site (consists of
individual emission sources	multiple facilities)
Permits include terms and conditions under	Permits include terms and conditions that specify the
which the applicant must construct and operate	general operational requirements of the site; and also
its various equipment and processes on a facility	include codification of all applicable requirements for
basis.	emission units at the site.
Opportunity for EPA review for Federal	Opportunity for EPA review, Affected states review, and
Prevention of Significant Deterioration (PSD) and	a Public petition period for every FOP.
Nonattainment (NA) permits for major sources.	
Permits have a table listing maximum emission	Permit has an applicable requirements table and
limits for pollutants	Periodic Monitoring (PM) / Compliance Assurance
	Monitoring (CAM) tables which document applicable
	monitoring requirements.
Permits can be altered or amended upon	Permits can be revised through several revision
application by company. Permits must be issued	processes, which provide for different levels of public
before construction or modification of facilities	notice and opportunity to comment. Changes that
can begin.	would be significant revisions require that a revised
	permit be issued before those changes can be operated.
NSR permits are issued independent of FOP	FOP are independent of NSR permits, but contain a list
requirements.	of all NSR permits incorporated by reference

## **New Source Review Requirements**

Below is a list of the New Source Review (NSR) permits for the permitted area. These NSR permits are incorporated by reference into the operating permit and are enforceable under it. These permits can be found in the main TCEQ file room, located on the first floor of Building E, 12100 Park 35 Circle, Austin, Texas. The Public Education Program may be contacted at 1-800-687-4040 or the Air Permits Division (APD) may be contacted at 1-512-239-1250 for help with any question.

Additionally, the site contains emission units that are permitted by rule under the requirements of 30 TAC Chapter 106, Permits by Rule. The following table specifies the permits by rule that apply to the site. All current permits by rule are contained in Chapter 106. Outdated 30 TAC Chapter 106 permits by rule may be viewed at the following Web site:

 $www.tceq.texas.gov/permitting/air/permitbyrule/historical\_rules/old106 list/index106.html$ 

Outdated Standard Exemption lists may be viewed at the following Web site:

www.tceq.texas.gov/permitting/air/permitbyrule/historical\_rules/oldselist/se\_index.html

The status of air permits and applications and a link to the Air Permits Remote Document Server is located at the following Web site:

www.tceq.texas.gov/permitting/air/nav/air\_status\_permits.html

Title 30 TAC Chapter 116 Permits, Special Permits, and Other Authorizations (Other Than Permits By Rule, PSD Permits, or NA Permits) for the Application Area.		
Authorization No.: 46558	Issuance Date: 02/02/2011	
Authorization No.: 46897	Issuance Date: 12/14/2011	
Authorization No.: 56398	Issuance Date: 06/30/2016	
Permits By Rule (30 TAC Chapter 106) for	the Application Area	
Number: 106.183	Version No./Date: 09/04/2000	
Number: 106.244	Version No./Date: 09/04/2000	
Number: 106.261	Version No./Date: 11/01/2003	
Number: 106.264	Version No./Date: 09/04/2000	
Number: 106.371	Version No./Date: 03/14/1997	
Number: 106.454	Version No./Date: 11/01/2001	
Number: 106.472	Version No./Date: 09/04/2000	
Number: 106.511	Version No./Date: 09/04/2000	

#### **Emission Units and Emission Points**

In air permitting terminology, any source capable of generating emissions (for example, an engine or a sandblasting area) is called an Emission Unit. For purposes of Title V, emission units are specifically listed in the operating permit when they have applicable requirements other than New Source Review (NSR), or when they are listed in the permit shield table.

The actual physical location where the emissions enter the atmosphere (for example, an engine stack or a sand-blasting yard) is called an emission point. For New Source Review preconstruction permitting purposes, every emission unit has an associated emission point. Emission limits are listed in an NSR permit, associated with an emission point. This list of emission points and emission limits per pollutant is commonly referred to as the "Maximum Allowable Emission Rate Table", or "MAERT" for short. Specifically, the MAERT lists the Emission Point Number (EPN) that identifies the emission point, followed immediately by the Source Name, identifying the emission unit that is the source of those emissions on this table.

Thus, by reference, an emission unit in a Title V operating permit is linked by reference number to an NSR authorization, and its related emission point.

## **Monitoring Sufficiency**

Federal and state rules, 40 CFR \$ 70.6(a)(3)(i)(B) and 30 TAC \$ 122.142(c) respectively, require that each federal operating permit include additional monitoring for applicable requirements that lack periodic or instrumental monitoring (which may include recordkeeping that serves as monitoring) that yields reliable data from a relevant time period that are representative of the emission unit's compliance with the applicable emission limitation or standard. Furthermore, the federal operating permit must include compliance assurance monitoring (CAM) requirements for emission sources that meet the applicability criteria of 40 CFR Part 64 in accordance with 40 CFR \$ 70.6(a)(3)(i)(A) and 30 TAC \$ 122.604(b).

With the exception of any emission units listed in the Periodic Monitoring or CAM Summaries in the FOP, the TCEQ Executive Director has determined that the permit contains sufficient monitoring, testing, recordkeeping, and reporting requirements that assure compliance with the applicable requirements. If applicable, each emission unit that requires additional monitoring in the form of periodic monitoring or CAM is described in further detail under the Rationale for CAM/PM Methods Selected section following this paragraph.

## Rationale for Compliance Assurance Monitoring (CAM)/ Periodic Monitoring Methods Selected

#### **Periodic Monitoring:**

The Federal Clean Air Act requires that each federal operating permit include monitoring sufficient to assure compliance with the terms and conditions of the permit. Most of the emission limits and standards applicable to emission units at Title V sources include adequate monitoring to show that the units meet the limits and standards. For those requirements that do not include monitoring, or where the monitoring is not sufficient to assure compliance, the federal operating permit must include such monitoring for the emission units affected. The following emission units are subject to periodic monitoring requirements because the emission units are subject to an emission limitation or standard for an air pollutant (or surrogate thereof) in an applicable requirement that does not already require monitoring, or the monitoring for the applicable requirement is not sufficient to assure compliance:

Unit/Group/Process Information		
ID No.: BOILER6		
Control Device ID No.: N/A	Control Device Type: N/A	
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 111, Visible Emissions	SOP Index No.: R1111-003	
Pollutant: PM (OPACITY)  Main Standard: § 111.111(a)(1)(A)		
Monitoring Information		
Indicator: Visible Emissions		
Minimum Frequency: once per calendar quarter		
Averaging Period: n/a		
Deviation Limit: If visible emissions are observed, a deviation shall be reported unless opacity is 30% or less as determined by Test Method 9 within 24 hours. If the result of the Test Method 9 opacity reading is over 30%, a deviation shall be reported.		

#### Basis of monitoring:

The option to perform opacity readings or visible emissions to demonstrate compliance is consistent with EPA Reference Test Method 9 and 22. Monitoring specifications and procedures for the opacity are consistent with federal requirements and include the EPA's Test Method 9 for determining opacity by visual observations. The monitoring specifications and procedures for the visible emissions monitoring are similar to "EPA Reference Method 22" procedures.

Unit/Group/Process Information		
ID No.: THEOBOIL		
Control Device ID No.: N/A Control Device Type: N/A		
Applicable Regulatory Requirement		
Name: 30 TAC Chapter 117, Subchapter B SOP Index No.: R7201-001		
Pollutant: CO Main Standard: § 117.310(c)(1)		

#### **Monitoring Information**

Indicator: Burner Configuration

Minimum Frequency: Monthly

Averaging Period: n/a

Deviation Limit: It is a deviation if the monthly configuration evaluation is not conducted, if the stack test is not conducted within 180 days of burner reconfiguration, or if the stack test indicates that CO emissions exceed 400 ppmv (3% O2, dry).

## Basis of monitoring:

In a boiler, burners are configured to achieve stable combustion and complete mixing of fuel and air. If these conditions are not met, incomplete combustion can occur, which causes an increase in smoke and pollutant emissions. It is common practice to establish the burner configuration for a boiler based on manufacturer's recommendations. This can maintain NOx and CO emissions at acceptable levels for specified operating conditions. If the burner is reconfigured (such as by altering baffle, diffuser, or damper positions, adjusting air flow direction, or changing the orientation of fuel injection jets), it is necessary to verify that the unit is still in compliance with emission limitations by conducting a stack test. A stack test is a widely practiced and accepted method of measuring NOx and CO emissions.

Unit/Group/Process Information			
ID No.: THEOBOIL			
Control Device ID No.: N/A Control Device Type: N/A			
Applicable Regulatory Requirement			
Name: 30 TAC Chapter 117, Subchapter B	SOP Index No.: R7201-001		
Pollutant: NO <sub>x</sub> Main Standard: § 117.310(d)(3)			

#### **Monitoring Information**

Indicator: Burner Configuration

Minimum Frequency: Monthly

Averaging Period: n/a

Deviation Limit: It is a deviation if the monthly configuration evaluation is not conducted, if the stack test is not conducted within 180 days of burner reconfiguration, or if the stack test indicates that NOx emissions exceed 30 ppmv (3% O2, dry) or 0.036 lb/MMBtu.

## Basis of monitoring:

In a boiler, burners are configured to achieve stable combustion and complete mixing of fuel and air. If these conditions are not met, incomplete combustion can occur, which causes an increase in smoke and pollutant emissions. It is common practice to establish the burner configuration for a boiler based on manufacturer's recommendations. This can maintain NOx and CO emissions at acceptable levels for specified operating conditions. If the burner is reconfigured (such as by altering baffle, diffuser, or damper positions, adjusting air flow direction, or changing the orientation of fuel injection jets), it is necessary to verify that the unit is still in compliance with emission limitations by conducting a stack test. A stack test is a widely practiced and accepted method of measuring NOx and CO emissions.

Compliance Review	
1. In accordance with 30 TAC Chapter 60, the compliance history was reviewed on August 31, 2016.	
Site rating: <u>5.82 / Satisfactory</u> Company rating: <u>5.82 / Satisfactory</u>	
(High $< 0.10$ ; Satisfactory $\ge 0.10$ and $\le 55$ ; Unsatisfactory $> 55$ )	
2. Has the permit changed on the basis of the compliance history or site/company rating?	No
Site/Permit Area Compliance Status Review	
1. Were there any out-of-compliance units listed on Form OP-ACPS?	No
2. Is a compliance plan and schedule included in the permit?	No
Available Unit Attribute Forms	
OP-UA1 - Miscellaneous and Generic Unit Attributes	
OP-UA2 - Stationary Reciprocating Internal Combustion Engine Attributes	
OP-UA3 - Storage Tank/Vessel Attributes	
OP-UA4 - Loading/Unloading Operations Attributes	
OP-UA5 - Process Heater/Furnace Attributes	
OP-UA6 - Boiler/Steam Generator/Steam Generating Unit Attributes	
OP-UA7 - Flare Attributes	
OP-UA8 - Coal Preparation Plant Attributes	
OP-UA9 - Nonmetallic Mineral Process Plant Attributes	
OP-UA10 - Gas Sweetening/Sulfur Recovery Unit Attributes	
OP-UA11 - Stationary Turbine Attributes	
OP-UA12 - Fugitive Emission Unit Attributes	
OP-UA13 - Industrial Process Cooling Tower Attributes	
OP-UA14 - Water Separator Attributes	
OP-UA15 - Emission Point/Stationary Vent/Distillation Operation/Process Vent Attributes	
OP-UA16 - Solvent Degreasing Machine Attributes	
OP-UA17 - Distillation Unit Attributes	
OP-UA18 - Surface Coating Operations Attributes	
OP-UA19 - Wastewater Unit Attributes	
OP-UA20 - Asphalt Operations Attributes	
OP-UA21 - Grain Elevator Attributes	
OP-UA22 - Printing Attributes	
OP-UA24 - Wool Fiberglass Insulation Manufacturing Plant Attributes	
OP-UA25 - Synthetic Fiber Production Attributes	
OP-UA26 - Electroplating and Anodizing Unit Attributes	
OP-UA27 - Nitric Acid Manufacturing Attributes	
OP-UA28 - Polymer Manufacturing Attributes	
OP-UA29 - Glass Manufacturing Unit Attributes	
OP-UA30 - Kraft, Soda, Sulfite, and Stand-Alone Semichemical Pulp Mill Attributes	
OP-UA31 - Lead Smelting Attributes	
OP-UA32 - Copper and Zinc Smelting/Brass and Bronze Production Attributes	
OP-UA33 - Metallic Mineral Processing Plant Attributes	
OP-UA34 - Pharmaceutical Manufacturing	
OP-UA35 - Incinerator Attributes	
OP-UA36 - Steel Plant Unit Attributes	
OP-UA37 - Basic Oxygen Process Furnace Unit Attributes	
OP-UA38 - Lead-Acid Battery Manufacturing Plant Attributes OP-UA39 - Sterilization Source Attributes	
OP-UA40 - Ferroalloy Production Facility Attributes OP-UA41 - Dry Cleaning Facility Attributes	
OP-UA41 - Dry Cleaning Facility Attributes OP-UA42 - Phosphate Fertilizer Manufacturing Attributes	
OP-UA42 - Phosphate Fertilizer Manufacturing Attributes OP-UA43 - Sulfuric Acid Production Attributes	
OP-UA44 - Municipal Solid Waste Landfill/Waste Disposal Site Attributes	
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- OP-UA45 Surface Impoundment Attributes
- OP-UA46 Epoxy Resins and Non-Nylon Polyamides Production Attributes
- OP-UA47 Ship Building and Ship Repair Unit Attributes
- OP-UA48 Air Oxidation Unit Process Attributes
- OP-UA49 Vacuum-Producing System Attributes
- OP-UA50 Fluid Catalytic Cracking Unit Catalyst Regenerator/Fuel Gas Combustion Device/Claus Sulfur
- **Recovery Plant Attributes**
- OP-UA51 Dryer/Kiln/Oven Attributes
- OP-UA52 Closed Vent Systems and Control Devices
- OP-UA53 Beryllium Processing Attributes
- OP-UA54 Mercury Chlor-Alkali Cell Attributes
- OP-UA55 Transfer System Attributes
- OP-UA56 Vinyl Chloride Process Attributes
- OP-UA57 Cleaning/Depainting Operation Attributes
- OP-UA58 Treatment Process Attributes
- OP-UA59 Coke By-Product Recovery Plant Attributes
- OP-UA60 Chemical Manufacturing Process Unit Attributes
- OP-UA61 Pulp, Paper, or Paperboard Producing Process Attributes
- OP-UA62 Glycol Dehydration Unit Attributes
- OP-UA63 Vegetable Oil Production Attributes